

WOLLMUTH MAHER & DEUTSCH LLP
Paul R. DeFilippo
90 Washington Valley Road
Bedminster, New Jersey 07921
- and -
500 Fifth Avenue
New York, New York 10110
Tel: (212) 382-3300
Email: pdefilippo@wmd-law.com

Proposed Counsel for LTL Management LLC

**UNITED STATES BANKRUPTCY COURT
DISTRICT OF NEW JERSEY**

In re:

LTL MANAGEMENT LLC,¹

Debtor.

Case No.: 21-30589 (MBK)

Chapter 11

SHORT FORM APPLICATION TO ADMIT BRAD B. ERENS *PRO HAC VICE*

TO: PARTIES ON THE COURT'S ELECTRONIC MAIL NOTICE LIST

PLEASE TAKE NOTICE that pursuant to Rule 2090-1 of the District of New Jersey Local Bankruptcy Rules, Wollmuth Maher & Deutsch LLP, proposed co-counsel for Debtor, LTL Management LLC (the "Debtor"), hereby makes the application before the United States Bankruptcy Court for the District of New Jersey, for the entry of an Order admitting Brad B. Erens of the law firm Jones Day *pro hac vice* in the within proceeding to represent the Debtor.

The undersigned relies upon the Certification of Paul R. DeFilippo and the Order Allowing Brad B. Erens to Appear as Counsel for Debtor, *Pro Hac Vice* entered in the Western District of North Carolina (Exhibit A),² in support of this application.

¹ The last four digits of the Debtor's taxpayer identification number are 6622. The Debtor's address is 501 George Street, New Brunswick, New Jersey 08933.

² The Court abrogated the requirement of attaching supporting documents in lieu of attaching the Order admitting the applicant in the Western District of North Carolina. See <http://www.njb.uscourts.gov/LTL>.

The undersigned hereby requests that, in accordance with D.N.J. LBR 2090-1, if no objection to the within application is filed within seven (7) days, the application be granted and the proposed form of Order be entered.

Dated: November 19, 2021
New York, New York

Respectfully submitted,

WOLLMUTH MAHER & DEUTSCH LLP

/s/ Paul R. DeFilippo
Paul R. DeFilippo
500 Fifth Avenue, 12th Floor
New York, New York 10110
-and-
90 Washington Valley Road
Bedminster, New Jersey 07921
Tel: (212) 382-3300
Fax: (212) 382-0050
Email: pdefilippo@wmd-law.com

Proposed Co-Counsel for LTL Management LLC